

Appendix N.

Emergency Planning Checklist for LEPCs and TEPCs

Section 303(a) of EPCRA requires each LEPC and TEPC to prepare an emergency response plan for their planning district. The LEPC and TEPC are required to review the plan at least once a year. LEPCs and TEPCs also must evaluate the need for resources necessary to develop, implement and exercise the plan, and to make recommendations with respect to additional resources that may be required and the means for providing these additional resources.

The plan shall include (but is not limited to) each of the following items below.

1. Identification of facilities subject to the requirements of this subtitle that are within the emergency planning district, identification of routes likely to be used for the transportation of substances on the list of EHSs referred to in Section 302(a), and identification of additional facilities contributing or subjected to additional risk due to their proximity to facilities subject to the requirements of this subtitle, such as hospitals or natural gas facilities.
2. Methods and procedures to be followed by facility owners and operators and local emergency and medical personnel to respond to any release of such substances.
3. Designation of a community emergency coordinator and facility emergency coordinators, who shall make determinations necessary to implement the plan.
4. Procedures providing reliable, effective and timely notification by the facility emergency coordinators and the community emergency coordinator to persons designated in the emergency plan—and to the public—that a release has occurred (consistent with the emergency notification requirements of Section 304).
5. Methods for determining the occurrence of a release and the area or population likely to be affected.
6. A description of emergency equipment and facilities in the community and at each facility and an identification of the persons responsible for such equipment and facilities.
7. Evacuation plans, including provisions for a precautionary evacuation and alternative traffic routes.
8. Training programs, including schedules for training of local emergency response and medical personnel.
9. Methods and schedules for exercising the emergency plan.

GUIDELINES FOR EMERGENCY RESPONSE PLANNING UNDER EPCRA SECTION 303

Below is a set of guidelines for each item listed above. Each set of guidelines provides:

- The intent of each element.
- Specification of information required.

- Recommendations are provided for certain elements required in the emergency plan.

Element #1

1(a) Identification of facilities subject to the requirements of EPCRA Section 302 within the LEPC or TEPC planning district.

Intent

The intent of this item is to identify for public safety information and planning purposes any high- risk facilities within the jurisdiction that use or store on site large amounts of extremely hazardous substances.

Required

Include a current list of covered EPCRA facilities within the jurisdiction, providing current name of each facility, street address of the facility and an emergency contact telephone number for the facility.

1(b) Identification of routes likely to be used for the transportation of substances on the list of EHSs referred to in Section 302 (a).

Intent

The intent of this item is to identify the location of the covered facilities that may be transporting EHSs and to identify the primary and secondary routes used within the jurisdiction for such transportation.

Required

1. Identify the location of covered 302 facilities within the jurisdiction.
2. Identify the primary and secondary routes used for transportation of EHSs to and from the covered facilities.

Recommended

Maps are the preferred method of doing this item and are recommended; however, maps are not required, and the information can be provided in writing.

1(c) Identification of additional facilities contributing or subjected to additional risk due to their proximity to facilities subject to the requirements of EPCRA Section 302, such as hospitals or natural gas facilities.

Intent

The intent of this item is to identify non-302 facilities with hazardous chemicals that add risk due to their proximity to Section 302 facilities if a release occurs at either facility within the jurisdiction, such as hospitals, daycare centers, schools, fire stations, local government offices, etc.

Required

1. Name and address of 302 facility.

2. Name and address of nearby non-302 facilities contributing additional risk.
3. Name and address of nearby facilities at additional risk because of nearness to 302 facility.
4. Primary/secondary contact names at those nearby at risk facilities, including title and 24-hour telephone number

Recommended

1. A list of relevant hazardous chemicals at nearby non-302 facilities is desirable but not required.
2. Maps are the preferred method and are recommended; however, maps are not required, and the information can be provided in writing.
3. A description of occupancy is desirable but not required.

Guidance for Planning Element (#1)

It will be necessary to identify by name and location each EHS facility and to specifically identify transportation routes within the district and local routes between the facilities and the transportation routes over which EHSs are likely to pass. You do not have to identify every road that these substances might travel.

A map identifying facilities and transportation routes is recommended but does not have to be included in the plan.

To identify facilities with EHSs in your community the following suggestions are made:

- i. Legal ads in local newspapers.
- ii. Other media releases.
- iii. Certified letters to local businesses and industries reminding them of the requirements of EPCRA.
- iv. Research databases maintained by the state or EPA on various permitted facilities (RCRA, Air, Water, etc.).
- v. Inquiries to the local Chamber of Commerce.
- vi. Check the manufacturing directory from the state Department of Labor or state Department of Commerce, for industries listed in the NAICS as manufacturers.
- vii. Locate water and sewage treatment plants using chlorine.
- viii. Locate large refrigeration systems using ammonia.

LEPCs and TEPCs may request EHS facilities assist with conducting vulnerability analysis to identify the part of the community that would be affected if a chemical accident occurs. The vulnerability analysis should be based upon the “worst-case” accident scenario for each EHS.

Facilities in your planning district that are subject to Risk Management Program under Clean Air Act Section 112 (r) may have determined worst-case scenarios for substances covered under that

program, many of which are also EPCRA EHSs. You may contact EPA to obtain a copy of the facilities' RMP if one is submitted.

Pre-modeling is the best way to determine the necessary size of your planning zone for a given facility. In the event a facility is unable to provide a vulnerability analysis, the LEPC and TEPC may be able to conduct your own modeling using free software available (i.e., ALOHA, RMP*Comp). Please see a description of these software applications in this document. (*See 16.27.*)

Planning Element #1 also requires local plans to identify additional facilities contributing or subjected to additional risk due to their proximity to facilities (handling EHSs), such as hospitals or natural gas facilities. Unless a vulnerability analysis is done for each facility in your community, it will be difficult to determine which of these other kinds of facilities should be considered in "proximity" to facilities handling EHSs. Identification of these other facilities is a very important element of a good emergency plan.

It should be noted EPCRA does not require a scientifically based vulnerability analysis for facilities handling extremely hazardous substances. In other words, it is permissible to identify the vulnerable zone—and facilities such as hospitals located inside that zone—using judgment alone instead of computer models or other technical aids, such as the EPA guidance document, NRT-1, *Hazardous Materials Emergency Planning Guide*, March 1987. In fact NRT-1 acknowledges that this approach may have to be used in some instances. However, local planners are urged to develop their emergency plans based upon pre-modeling of vulnerable zones to the greatest extent possible.

Element #2

2(a) Methods and procedures to be followed by facilities to respond to any release of such substance.

Intent

The intent of this item is to set forth minimal emergency response actions to be followed by covered facilities and to assure immediate notification of designated public safety authorities to facilitate a timely and appropriate governmental response, if necessary.

Required

1. Covered facilities in the jurisdiction must maintain current plans describing methods and procedures to be followed by facility personnel if there is an accidental release of a hazardous substance(s) (such plans may incorporate requirements of various federal or state agencies and counties or municipalities).
2. At a minimum, facility plans must meet the emergency notification requirements of EPCRA, Section 304. The plan must include which office/dispatcher/hotline/other number(s) established by LEPC (or TEPC) and SERC (or TERC) should be included. The contact information of each of these organizations should be shared with facilities in your jurisdiction (planning district).

2(b) Methods and procedures to be followed by local emergency and medical personnel to respond to a release.

Intent

The intent of this item is to provide a safe, organized response to hazardous chemical incidents at designated EPCRA Section 302 facilities and elsewhere in the jurisdiction.

Required

1. Identify the primary response agencies, the role of each agency and level of response training.
2. Identify secondary responders (emergency management, public works, etc.), the role of each and their level of response training.
3. Identify mutual aid response agencies, the role of each agency and level of response training.
4. Identify special response agencies (regional hazmat teams, emergency management, etc.) and the role of each agency.
5. Identify the location of each primary and secondary response agency's operating procedures and the title of the individual within each agency responsible for the development of such procedures.
6. Identify procedures to notify local hospitals or other emergency medical centers to be prepared to treat citizens exposed to chemicals.

Guidance for Planning Element (#2)

This planning element does not require the inclusion of tactical firefighting or "pre-fire" plans in the local emergency plan that will be submitted to the state, nor does it require strictly internal, company-level emergency procedures be included.

The "procedures to be followed by facility owners and operators" spoken of in this planning element are facility procedures, which require coordination, communication or interfacing with off-site authorities. Examples could include dispatching a public information officer or liaison to the local government operations center or a command post, making recommendations to local officials regarding protective actions (shelter, evacuation) and the areas in which to implement protective actions.

The local emergency and medical procedures required by planning element (#2) could include procedures for:

- i. Making decisions regarding protective actions.
- ii. Notification to the appropriate state agencies for environmental and emergency response.
- iii. Requesting mutual aid support from other communities and the state.
- iv. Restricting access to threatened areas.
- v. Activation of the local Emergency Operations Center (EOC), if required.

- vi. Establishment of an on-scene command post, if required.
- vii. A clear description of the local chain of command.
- viii. Emergency medical procedures including procedures to mobilize outside assistance to handle a mass casualty incident.
- ix. Providing timely and accurate releases to the media on conditions at the site, operations and effects of the incident upon persons, property and sensitive areas (e.g. drinking water supplies).
- x. Soliciting advice from CHEMTREC or other chemical support organizations.

NOTE: Each LEPC and TEPC will have to determine how extensively its plan should address response procedures for emergency and medical personnel. The list above contains some basic areas of emergency response and management that all local plans should address to some degree.

Element #3

3(a) Designation of a community emergency coordinator (or Emergency Management Director) who shall make determinations necessary to implement the plan.

Intent

The intent of this item is to identify the person or persons authorized to implement the community emergency plan in the event of a hazardous chemical release.

While more than one individual may hold such authority, at least during the initial stages of an emergency, a single individual must be designated as responsible for the overall implementation of the community emergency plan.

Required

The (a) Name, (b) Title, (c) 24-hour telephone contact information must be provided for the community emergency coordinator and also for at least one alternate to the emergency coordinator.

3(b) Designation of a facility coordinator who shall make determinations necessary to implement the plan.

Intent

The intent of this item is to identify an appropriate facility representative (facility emergency coordinator) responsible for emergency planning and response and to provide their direct 24-hour contact information for use in the event of a hazardous chemical emergency.

Required

EPCRA Section 303(d)(1) requires facilities covered under emergency planning notification of EPCRA Section 302 is required to provide the name of a representative that will participate in the emergency planning process. Another facility representative that should be included is

someone who is available anytime for local responders/the community emergency coordinator to contact during an emergency. These two individuals may be requested to participate in developing the emergency response plan for your planning district.

This part of the plan should include name, title, work and 24-hour telephone numbers of each of these representatives. If there are no 302 facilities in the jurisdiction, this should be indicated. While there may not be any facilities that are subject to EPCRA Section 302, EPA encourages LEPCs and TEPCs to develop the plan to include emergencies involving all hazardous chemicals as discussed in Chapter 5 of this document.

Guidance for Element (#3)

The facility emergency coordinator referred to above will communicate frequently with off-site authorities regarding conditions at the facility and public protective actions that might be necessary. The plan should specify, by job title, who will act as an alternate.

The community emergency coordinator referred to above is the individual responsible for directing the local government response to a hazardous substance incident.

In communities with full-time fire departments, it is recommended that the senior officer in the fire department be the community coordinator. In communities without full-time fire departments, it may be necessary to designate someone else, such as a police shift supervisor until the senior fire officer can arrive on the scene.

If an individual is specifically named as the coordinator, then alternates should also be named. A primary consideration in selecting an emergency coordinator is the individual can be reached quickly at all times and has the authority, or is given the authority under the plan, to make critical decisions about what is to be done and to direct response activities.

Element #4

(4) Describe procedures providing reliable, effective and timely notification by the facility emergency coordinators to persons designated in the emergency plan, and to the public, that a release has occurred (consistent with the emergency notification requirements of EPCRA, Section 304.)

Intent

The intent of this item is to identify the responsible facility personnel and their procedures to be followed in notifying facility responders and the affected community by notifying the community emergency coordinator that a hazardous chemical release has occurred.

Required

Notification procedures must include, but are not limited to:

1. Designated personnel to be notified of a hazardous chemical release.
2. Personnel responsible for public notification (e.g., community emergency coordinator).

3. Method(s) used to notify the public that a hazardous release has occurred.
4. Criteria used for mass public notification.

Guidance for Planning Element (#4)

This planning element is perhaps the most important part of the emergency plan. All plans must include a clear, concise and viable procedure, whereby EHS facilities in the district can provide notification of any chemical accidental release to local authorities. In most cases, this procedure will be a simple telephone call to a warning point manned on a 24-hour basis, such as a fire department, police department or dispatch center. If some other means of notification is available as a backup, this should be stated.

The procedure should specify responsibility for making the call and the information to be provided.

LEPCs and TEPCs should work closely with their facility representatives to determine what information can and should be provided as part of initial notification. The plan should include the requirements of EPCRA 304 for initial notification of releases of CERCLA hazardous substances and EHSs. See Chapter 4 for details on these requirements.

It is not necessary that local plans contain internal facility alert rosters, but plans should state how the facility coordinator and/or his alternate will be notified of an incident by facility personnel.

Once notification of an incident has been made by the facility, the plan should clearly state how the notification will be fanned out by the warning point to local emergency response organizations, including support agencies such as the Red Cross if necessary.

The other procedure mandated by this planning element is notification of the public that a release has occurred. Reliable, effective and timely notification of the public is a critical element of a good emergency plan. Local emergency plans should contain a procedure for rapidly disseminating emergency information and instructions over the local Emergency Alert System (EAS) station.

Pre-scripted messages should be considered, and it is recommended that plans specify how the EAS message will be coordinated with an attention signal sounded by area sirens (if available). Plans should also contain a "Paul Revere" public notification method using emergency vehicles equipped with public address systems. The plan should specify which local department(s) will be responsible for notifying particular areas of the community.

Door-to-door and/or telephone notification procedures should be considered for facilities such as nursing homes located in threatened areas, as well as using other notification systems, such as reverse 9-1-1 systems.

Element #5

5(a) Methods for determining the occurrence of a release.

Intent

The intent of this item is to assure releases of EHSs at facilities subject to emergency planning notification (EPCRA Section 302), LEPC (or TEPC) jurisdiction are detected in a timely manner.

Required

1. Identify the covered EPCRA Section 302 facilities in the jurisdiction that do, and those that do not have in place and on-site adequate systems, methods and/or procedures to detect and determine in a timely manner that a release of an EHS has occurred.
2. Describe the individual systems, methods and/or procedures by reference to the specific EPCRA Section 302 facilities' emergency response plans on file with the jurisdiction.

5(b) Methods for determining the area or populations likely to be affected by such a release.

Intent

The intent of this item is to assess the seriousness of the release, its scope and the potential hazard(s) it may cause to the surrounding population.

Required

Information required to determine the affected area and populations includes, but is not limited to the following:

- The identity of the substance released.
- The approximate quantity of the release.
- The hazard(s) created by the release.
- The impact on the surrounding community created by the release.
- Meteorological and other local conditions.

Guidance for Planning Element (#5)

This planning element requires a description of any release detection or monitoring devices in operation at a facility which would provide for discovery of a release.

If there are none, the plan should so state and provide instead a description of how a release would most likely be detected by the physical senses and/or physical affects upon people and who would most likely sense or perceive these affects first.

In addition, this planning element requires a description of how to determine potentially affected areas or populations. To meet this requirement, plans must describe the best available method for quickly determining wind direction and how to utilize wind direction information in conjunction with either real-time computer dispersion models or previously developed information about the vulnerable zone of a given facility to determine the area affected.

Element #6

6(a) A description of emergency equipment and facilities in the community, and an identification of the persons responsible for such equipment and facilities.

Intent

The intent of this item is to identify in advance the local availability of public and private response resources suitable for use during a hazardous chemical incident.

Required

1. A listing of publicly owned and available specialized resources (tools, materials, equipment, facilities and qualified personnel) for use in responding to a hazardous chemical incident, along with the location of all such specialized resources, title and 24-hour contact number(s) of the personnel authorized to release the resources for use in an emergency incident.
2. A listing of privately owned and available specialized resources (tools, materials, equipment, facilities and qualified personnel) for use in responding to a hazardous chemical incident, along with the location of all such specialized resources, title and 24-hour contact number(s) of the personnel authorized to release the resources for use in an emergency incident.

Recommendations

Reference can be made to the resource manual containing the above information that is maintained by many jurisdictions. Such reference should include the location of any such manual of resources and a copy of the table of contents or index page.

In addition, it is recommended that any agreements with schools, churches, bus companies, etc., for congregate care and public transportation, as well as agreements with qualified hazardous materials clean up contractors, other jurisdictions, etc., be included.

6 (b) A description of emergency equipment and facilities at each facility in the community subject to the requirements of EPCRA, Section 302, and an identification of the persons responsible for such equipment and facilities.

Intent

The intent of this item is to:

1. Identify which covered Section 302 facilities within the jurisdiction have on their site specialized tools and equipment to effectively respond to an accidental release of that facility's hazardous substance(s).
2. Identify if and how specialized tools and equipment located on site at Section 302 facilities within the jurisdiction may be available for emergency response use at hazardous materials incidents elsewhere.

Required

A statement from the emergency management director or other responsible public safety official in the jurisdiction indicating which, if any, covered 302 facilities within the jurisdiction have

specialized tools and response equipment available for use at an off-site hazardous materials incident, along with rules for their release and use.

Any such specialized tools and equipment should be incorporated into the list of available private resources.

Recommendations

Memoranda or agreements of understanding between the jurisdiction and facilities regarding release and use of specialized tools and emergency response equipment for off-site purposes are encouraged, and mention of the same is recommended in any lists of available private resources maintained by the jurisdiction.

Guidance for Planning Element (#6)

This planning element requires a list of resources (e.g., equipment and facilities) applicable to a hazardous substance incident. Local government and facility resources must be included, along with an identification of the persons responsible for such equipment.

Wherever possible, this identification should be by job title with a phone number(s) for the person responsible included.

Although the list should be limited to resources germane to a hazardous substance incident, local planners and facility representatives are urged to "think through" an incident and thoroughly contemplate the types and amounts of equipment and supplies which would be needed to respond effectively and protect emergency responders.

Element #7

(7) Evacuation plans, including provisions for a precautionary evacuation and alternative traffic routes.

Intent

The intent of this item is to describe evacuation plans for the jurisdiction, including identification of primary and alternate traffic evacuation routes.

Required

1. Identification of primary and alternate evacuation routes within the jurisdiction (if a GIS map is not used, the names/numbers of streets, roads and highways must be used).
2. Describe evacuation plans, including but not limited to the following:
 - Public notification procedure.
 - Procedures for initiating a protect-in-place option.
 - Provisions to move special populations.
 - Determination of re-entry procedures.

- Identification of shelter locations.

Guidance for Planning Element (#7)

The most effective evacuations are those undertaken and completed before the release of an EHS occurs.

Plans should include a statement acknowledging this protective action option and the effectiveness of precautionary evacuations.

Plans should identify special institutions such as schools, hospitals, jails, nursing homes, etc. Plans should also discuss precautionary preparations to evacuate special institutions during hazmat incidents.

It is not necessary to include maps in the plan itself showing specific evacuation routes, but for some facilities located in areas difficult to evacuate, pre-planning of evacuation routes and maps are advisable.

Local plans must specify who will have the authority to order an evacuation. Plans must also specify which departments will provide evacuation assistance to special facilities such as nursing homes, hospitals, jails, etc.

Plans must acknowledge officials responsible for protective action decisions will consider the merits of a "take shelter" protective action as opposed to an evacuation.

Plans need not identify specific traffic routes to be used as detours around facilities or major transportation routes on which a hazmat incident has occurred. However, each plan must identify an individual, by title, who shall be responsible for determining alternative traffic routes, as well as departments and agencies that shall handle re-routing of traffic. Lead and support agencies should be identified.

Element #8

(8) Training programs, including schedules for training of local emergency response and medical personnel.

Intent

The intent of this item is to describe a jurisdiction's training programs and identify the types and levels of training contained in those programs and the responders who receive the training.

Responders may include: fire, law enforcement, EMS, emergency management, public works or other response groups.

Required

Training documentation must contain the following information. More information can be added, if desired.

- Location of records.
- Type of training.
- Level of training (awareness level, operations level, technician level).
- Personnel who received the training.
- Frequency of training.

Guidance for Planning Element (#8)

Information regarding hazardous chemical training offered can be obtained through the state training officer of the emergency management agency.

The LEPC and TEPC should survey all organizations represented on the LEPC (or TEPC) to determine if specific-agency training might be beneficial to other personnel. Local planners may incorporate this information into their plans to meet the requirements of planning element (8).

Element #9

(9) Methods and schedules for exercising the emergency plan.

Intent

The intent of this item is to demonstrate the jurisdiction is seriously testing on a regular basis its ability to respond to a hazardous chemical incident.

Required

A copy of the jurisdiction's methods and schedules for exercising its emergency plan must be provided or referenced (include location of this information).

Guidance for Planning Element (9)

Local plans should describe how frequently exercises will be held, the type of exercise to be conducted (e.g., full-scale, tabletop or functional), and who is responsible for organizing and conducting exercises of the plan. The three basic forms of exercises are defined below. It is recommended these definitions be included in local plans.

a. Tabletop Exercise

An activity in which elected/appointed officials and key staff with emergency management responsibilities are gathered informally to discuss various simulated emergency situations. The exercise is designed to elicit constructive discussion by the participants without time constraints as they examine and then attempt to resolve problems based on existing EOPs. The purpose is for participants to evaluate plans and procedures and to resolve questions of coordination and assignment of responsibilities throughout the exercise under minimum stress. An exercise of this type can usually be conducted in four hours or until the exercise objectives are met.

b. Functional Exercise

An activity designed to test or evaluate the capability of individual or multiple functions or activities within a function. This exercise is more complex than a tabletop exercise in that

activities are usually under some type of time constraint with the evaluation/critique coming at the end of the exercise. It can take place in some type of operations center, the field, or a combination of both. For example, a direction and control functional exercise would be an activity designed to test and evaluate the centralized emergency operations capability and timely response of one or more units of government under a stress environment. It is centered in an emergency operations center and can simulate the use of outside activity and resources. An exercise of this type can usually be conducted in four to eight hours or until the exercise objectives have been met.

c. Full Scale Exercise

The full-scale exercise is intended to evaluate the operational capability of emergency management systems in an interactive manner over a substantial period of time. It involves the testing of a major portion of the basic elements existing within EOPs and organizations in a highly stressful environment. This type of exercise includes mobilization of personnel and resources, and the actual movement of emergency personnel, equipment, and resources to demonstrate coordination and response capability.

The emergency operations center is activated, and field command posts may be established. An exercise of this type can usually be conducted in eight hours or until the exercise objectives have been met.

Cities and towns receiving FEMA EMA funds and responding to actual emergencies or disasters may be given credit for an exercise providing certain criteria are met.